

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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R.F.M.A.S., INC.	:	
	:	
Plaintiff,	:	Case No. 06-CV-13114 (VM)(MHD)
v.	:	
	:	
MIMI SO, MIMI SO INTERNATIONAL, INC.,	:	
RICHEMONT S.A., COMPAGNIE FINANCIERE	:	
RICHEMONT S.A., RICHEMONT NORTH	:	
AMERICA, RICHEMONT HOLDINGS I, and	:	
RICHEMONT INTERNATIONAL, LTD.	:	
	:	
Defendants.	:	
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**NOTICE OF DEFENDANTS' MOTION TO  
EXCLUDE PLAINTIFF'S EXPERTS**

PLEASE TAKE NOTICE that Defendants, by their undersigned counsel, hereby move this Court, pursuant to Federal Rules of Evidence 403, 702 and 703 and pursuant to Supreme Court decisions in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 147 (1999), to exclude the testimony and reports of Plaintiff's experts, Don Smith, Steven Hansen, Joyce Jonas and Edward Lewand.

The grounds for the motion are set forth in detail in the accompanying Memorandum of Law in Support of Defendants' Motion to Exclude Plaintiff's Experts and the annexed Declaration of Richard Lehv dated December 1, 2009, and Exhibits thereto. The Memorandum of Law and certain confidential Exhibits are filed under seal, in keeping with the Protective Order entered by this Court on or about June 12, 2008.

RESPECTFULLY SUBMITTED this 1st day of December, 2009.

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

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Richard Z. Lehv ([rlehv@fzlz.com](mailto:rlehv@fzlz.com))  
John P. Margiotta ([jmargiotta@fzlz.com](mailto:jmargiotta@fzlz.com))  
Alexander L. Greenberg ([agreenberg@fzlz.com](mailto:agreenberg@fzlz.com))  
866 United Nations Plaza  
New York, New York 10017  
Tel.: (212) 813-5900  
Fax: (212) 813-5901

*Attorneys for the Richemont Defendants*

Deepro R. Mukerjee  
([Deepro.Mukerjee@alston.com](mailto:Deepro.Mukerjee@alston.com))  
90 Park Avenue  
ALLSTON & BIRD LLP  
New York, NY 10016  
Tel.: (212) 210-9501  
Fax: (212) 922-3881

*Attorneys for Defendants Mimi So and  
Mimi So International, Inc.*